

1 DANIEL J. BERGESON, Bar No. 105439
bergeson@be-law.com
2 JOHN W. FOWLER, Bar No. 037463
jfowler@be-law.com
3 MELINDA M. MORTON, Bar No. 209373
mmorton@be-law.com
4 BERGESON, LLP
303 Almaden Boulevard, Suite 500
5 San Jose, CA 95110-2712
Telephone: (408) 291-6200
6 Facsimile: (408) 297-6000

7 Attorneys for Plaintiff
VERIGY US, INC.
8

9
10
11
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

12 VERIGY US, INC, a Delaware Corporation
13 Plaintiff,
14 vs.
15 ROMI OMAR MAYDER, an individual;
WESLEY MAYDER, an individual; SILICON
TEST SYSTEMS, INC., a California Corporation;
and SILICON TEST SOLUTIONS, LLC, a
California Limited Liability Corporation,
inclusive,
16
17
18 Defendants.
19

Case No. C07 04330 RMW (HRL)

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S ADMINISTRATIVE
MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

Judge: Honorable Howard R. Lloyd
Ctrm: 2

20
21
22
23
24
25
26
27
28

1 Now before the Court is Verigy's Administrative Motion For Leave To File Documents
2 Under Seal. Upon consideration of the Administrative Motion for Leave to File Documents Under
3 Seal and the supporting declaration of Melinda Morton filed therewith, the Court finds there to be
4 good cause for granting Plaintiff's request to file documents under seal.

5 GOOD CAUSE having been shown, the Court finds that:

6 (1) The parties possess overriding confidentiality interest that overcomes the
7 right of public access to the record in the following documents:
8 a. Portions of Verigy's Notice of Motion and Motion to Compel Amended
9 Response and Responsive Information to Request for Production No. 17
10 from Romi Mayder and Silicon Test Systems, Inc.; Supporting
11 Memorandum of Points and Authorities in Support (the "MPA"); and
12 b. Exhibits D, E, F, G, H, J, K, and L to the Declaration of Melinda M.
13 Morton.
14 (2) The parties' overriding confidentiality interests support sealing the record;
15 (3) A substantial probability exists that the parties' overriding confidentiality
16 interest will be prejudiced if the record is not sealed;
17 (4) The proposed sealing is narrowly tailored; and
18 (5) No less restrictive means exist to achieve this overriding interest.

19
20 IT IS THEREFORE ORDERED that Verigy's Motion for Leave to File Documents Under
21 Seal is GRANTED.
22

23 **IT IS SO ORDERED.**
24

25 Dated: _____, 2007
26

27 Honorable Howard R. Lloyd
28 UNITED STATES DISTRICT JUDGE